

GARY M. RESTAINO  
United States Attorney  
District of Arizona

DIMITRA H. SAMPSON  
Assistant U.S. Attorney  
Arizona State Bar No. 019133  
Two Renaissance Square  
40 N. Central Ave., Suite 1800  
Phoenix, Arizona 85004  
Telephone: 602-514-7500  
Email: Dimitra.Sampson@usdoj.gov  
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
Plaintiff,

vs.

Samuel Rappylee Bateman,  
Defendant.

No. CR-22-08092-001-PCT-DGC

**GOVERNMENT'S UNOPPOSED  
MOTION FOR PROTECTIVE ORDER**

The United States moves for a protective order pursuant to Rule 16(d)(1) to restrict dissemination of the discovery materials produced in this case. In the interests of transparency and full disclosure, the United States has agreed to disclose the entirety of its investigation to date to the defendant, beyond what is required for the offenses currently charged, in addition to what has already been disclosed. However, those materials include private and personally identifying information (collectively "PII") relating to victims and witnesses in this case, including minors. Redacting the PII from all of those materials may inhibit the defense team in its ability to review and analyze some of the discovery, and will be unduly burdensome to redact. Also, these discovery materials contain sensitive information about cooperators.

Accordingly, the United States requests that this Court enter a protective order:

1. Permitting the government to provide to defense counsel the discovery

1 materials without redaction of PII, to the extent that PII is present in those materials;

2 2. Permitting defense counsel to share these discovery materials with other  
3 members of the defense team, including experts, investigators, and other professionals  
4 retained by the defendant or defense counsel to assist in the preparation of the defense;

5 3. Ordering all members of the defense team to safeguard and not disclose the  
6 materials provided to it, other than to the extent necessary to prepare the defense;

7 4. Permitting the defense team to review the materials with the defendant and  
8 potential witnesses to the extent necessary to prepare the defense;

9 5. Prohibiting the defendant and potential witnesses from retaining any of the  
10 materials during the course of the litigation; and

11 6. Ordering the defense team to destroy, at the conclusion of this matter, all of  
12 these discovery materials in its possession, except that defense counsel shall be allowed to  
13 retain these materials until the time expires for all appeals, collateral attacks, other writs or  
14 motions challenging the conviction or sentence, and actions for professional malpractice.

15 Undersigned counsel has consulted counsel for the defendant, who does not object  
16 to entry of the proposed protective order.

17 Respectfully submitted this 12<sup>th</sup> day of December, 2022.

18 GARY M. RESTAINO  
19 United States Attorney  
District of Arizona

20 *s/Dimitra H. Sampson*  
21 DIMITRA H. SAMPSON  
22 Assistant U.S. Attorney

23 **CERTIFICATE OF SERVICE**

24 I hereby certify that on December 12, 2022, I electronically transmitted the attached  
25 document to the Clerk's Office using the CM/ECF System for filing a copy to the following  
26 CM/ECF registrant: Adam Zickerman, *Attorney for Defendant*

27 *s/Keona L. Ross*  
28 U.S. Attorney's Office